

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

**DECLARATION OF MAYA R. KALONIA IN
SUPPORT OF PLAINTIFF'S STATEMENT
REGARDING DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL**

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION

JAYLYNN DEAN,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., et al.,

Defendants.

No. 25-cv-4276-PHX-CRB

Judge: Honorable Charles R. Breyer
Ctrm.: 501

DECLARATION OF MAYA R. KALONIA ISO PLAINTIFF'S STATEMENT REGARDING DEFENDANTS'
ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL

N.D. CAL. NO. 3:23-MD-03084; D. ARIZ. NO. 25-CV-4276

1 I, Maya R. Kalonia, declare:

2 1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the
3 above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to
4 practice before this Court. I make this declaration based on my own personal knowledge. If called upon to
5 testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit
6 this declaration in support of Plaintiff's Statement in Support of Defendants' Administrative Motion to
7 Consider Whether Another Party's Material Should be Filed Under Seal.

8 2. I have reviewed Defendants' Opposition to Plaintiff's Omnibus Motions in Limine and
9 attached Exhibits 3-8, filed at ECF Nos. 4847, 4847-5, 4847-6, 4847-7, 4847-8, 4847-9, and 4847-10,
10 respectively.

11 3. Defendants' Opposition includes information regarding Plaintiff's mental health history,
12 intimate and sensitive aspects of Plaintiff's personal and family life, and past substance abuse by a third
13 party.

14 4. Exhibit 3 contains information regarding intimate and sensitive aspects of Plaintiff's
15 personal and family life, substance abuse by a third party, Plaintiff's medical and mental health history, and
16 the names of third parties.

17 5. Exhibit 4 includes information regarding Plaintiff's medical and mental health history,
18 intimate and sensitive aspects of Plaintiff's personal and family life, substance abuse by a third party, and
19 the names of third parties.

20 6. Exhibit 5 contains intimate and sensitive aspects of Plaintiff's personal and family life.

21 7. Exhibit 6 contains the birth date of a third party and information regarding intimate and
22 sensitive aspects of Plaintiff's personal and family life.

23 8. Exhibit 7 contains the name, phone number, address, and dates of birth of third parties and
24 intimate and sensitive aspects of Plaintiff's personal and family life.

25 9. Exhibit 8 contains the intimate and sensitive aspects of another bellwether plaintiff's
26 personal and family life and substance abuse by a third party in that case.

10. Disclosure of the identified information in Defendants' Opposition and Exhibits 3-8 may be used by a third party to gratify private spite, promote scandal, or circulate libel.

11. The significant privacy concerns of plaintiffs and third parties outweigh the public's minimal interest in knowing their identities or personal information. The public's interest in the case may be satisfied without revealing this information.

12. There is no less restrictive alternative to sealing portions of Defendants' Opposition and Exhibits 3-8 that would protect the legitimate privacy interests of plaintiffs and third parties. Plaintiff's request is narrowly tailored to seal only PII and highly sensitive information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2026 in Oakland, California.

/s/ Maya R. Kalonia

Maya R. Kalonia